

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SHANNON PEREZ; HAROLD)
DUTTON, JR.; GREGORY TAMEZ;)
SERGIO SALINAS; CARMEN)
RODRIGUEZ; RUDOLFO ORTIZ;)
NANCY HALL and DOROTHY)
DEBOSE,)

Plaintiffs)

-and-)

EDDIE BERNICE JOHNSON, SHEILA)
JACKSON-LEE, and ALEXANDER)
GREEN, MEMBERS OF THE UNITED)
STATES CONGRESS)

-and-)

TEXAS LEGISLATIVE BLACK)
CAUCUS, TEXAS HOUSE OF)
REPRESENTATIVES)

-and-)

TEXAS STATE CONFERENCE OF)
NAACP BRANCHES; HOWARD)
JEFFERSON, JUANITA WALLACE)
and REV. BILL LAWSON)

Plaintiff-Intervenors)

v.)

STATE OF TEXAS; RICK PERRY, in)
his official capacity as Governor of the)
State of Texas; DAVID DEWHURST,)
in his official capacity as Lieutenant)
Governor of the State of Texas; JOE)
STRAUS, in his official capacity as)
Speaker of the Texas House of)
Representatives, HOPE ANDRADE, in)
her official capacity as Secretary of State)

CIVIL ACTION NO.
11-CA-360-OLG-JES-XR
[Lead case]

of the State of Texas,)

MEXICAN AMERICAN)
LEGISLATIVE CAUCUS, TEXAS)
HOUSE OF REPRESENTATIVES)
(MALC),)

Plaintiffs)

-and-)

THE HONORABLE HENRY)
CUELLAR, Member of Congress,)
CD28; THE TEXAS DEMOCRATIC)
PARTY and BOYD RICHIE, in his)
official capacity as Chair of the Texas)
Democratic Party; and LEAGUE OF)
UNITED LATIN AMERICAN)
CITIZENS (LULAC) and its)
individually named members)

Plaintiff-Intervenors,)

v.)

STATE OF TEXAS; RICK PERRY, in)
his official capacity as Governor of the)
State of Texas; DAVID DEWHURST,)
in his official capacity as Lieutenant)
Governor of the State of Texas; JOE)
STRAUS, in his official capacity as)
Speaker of the Texas House of)
Representatives;)

Defendants.)

TEXAS LATINO REDISTRICTING)
TASK FORCE, JOEY CARDENAS,)
ALEX JIMENEZ, EMELDA)
MENENDEZ, TOMACITA)
OLIVARES,)

Plaintiffs,)

CIVIL ACTION NO.
SA-11-CA-361-OLG-JES-XR
[Consolidated case]

v.
RICK PERRY, in his official capacity as
Governor of the State of Texas

Defendant.

CIVIL ACTION NO.
SA-11-CA-490-OLG-JES-XR
[Consolidated case]

MARGARITA V. QUESADA; ROMEO
MUNOZ; MARC VEASEY; JANE
HAMILTON; LYMAN KING; and
JOHN JENKINS

Plaintiffs,

v.
RICK PERRY, in his official capacity as
Governor of the State of Texas, and
HOPE ANDRADE, in her official
capacity as Secretary of State of the
State of Texas

Defendants.

CIVIL ACTION NO.
SA-11-CA-592-OLG-JES-XR
[Consolidated case]

JOHN T. MORRIS,

Plaintiff

v.
STATE OF TEXAS, RICK PERRY, in
his official capacity as Governor of the
State of Texas, DAVID DEWHURST,
in his official capacity as Lieutenant
Governor of the State of Texas; JOE
STRAUS, in his official capacity as
Speaker of the Texas House of
Representatives; and HOPE
ANDRADE, in her official capacity as
Secretary of State of the State of Texas

EDDIE RODRIGUEZ, MILTON
GERARD WASHINGTON, BRUCE

ELFANT, ALEX SERNA, SANDRA
 SERNA, BETTY F. LOPEZ, DAVID
 GONZALEZ, BEATRICE SALOMA,
 LIONOR SOROLA-POHLMAN;
 ELIZA ALVARADO; JUANITA
 VALDEZ-COX; JOSEY MARTINEZ;
 NINA JO BAKER; TRAVIS COUNTY
 and CITY OF AUSTIN,

Plaintiffs,

v.

RICK PERRY, in his official capacity as
 Governor of the State of Texas, DAVID
 DEWHURST, in his official capacity as
 Lieutenant Governor of the State of
 Texas; JOE STRAUS, in his official
 capacity as Speaker of the Texas House
 of Representatives; HOPE ANDRADE,
 in her official capacity as Secrdary of
 State of the State of Texas; STATE OF
 TEXAS; BOYD RICHIE, in his official
 capacity as Chair of the Texas
 Democratic party; and STEVE
 MUNISTERI, in his official capacity as
 Chair of the Republican Party of Texas,

Defendants.

CIVIL ACTION NO.
 SA-11-CA-635
 [Consolidated case]

PLAINTIFFS' NOTICE OF FILING OF
EXPERT WITNESS REPORTS

TO THE HONORABLE JUDGES OF SAID COURT:

NOW COME SHANNON PEREZ, HAROLD DUTTON, JR., GREGORY TAMEZ,
 SERGIO SALINAS, CARMEN RODRIGUEZ, RUDOLFO ORTIZ, NANCY HALL and
 DOROTHY DEBOSE, Plaintiffs, by and through their counsel of record, and pursuant to the
 Court's July 25, 2011, Order and Federal Rule of Civil Procedure 26, submit these their expert
 reports:

I.

Attached are the following expert witness reports:

- Attachment A: “The Anatomy of a Retrogressive and Discriminatory Map: Minority Voting Rights Trampled Bipartisan Gerrymander and Texas House Plan,” Report by Ed Martin, Robert Jara, and James Aldrete;
- Attachment B: “An Analysis of Racial and Ethnic Discrimination in Texas, Racial Polarization, and the Voting Rights Act With Regard to Redistricting Plan H283,” Report of Richard Murray;
- Attachment C: Report of Allan Lichtman;
- Attachment D: Report of Jeffrey A. Smith.

II.

All experts rely upon documents and data contained within, referred to, or attached to their reports as well as the election data publicly available from the Texas Legislative Council website.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on 8/8/2011 I served a copy of Plaintiffs' Notice of Filing of Expert Witness Reports and attachments on counsel who are registered to receive NEFs through the CM/ECF system. All attorneys who have not yet registered to receive NEFs have been served via first-class mail, postage prepaid and addressed as follows:

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